

ENGINEERING STATEMENT
In Support of a
Counterproposal
MM Docket 99-357
Rawhide Radio, LLC

Summary of Channel Assignments

(Depicting all communities, channels, and modifications)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Cuero, TX	AP 210A, AD 280A, 249C3 , KTXC(AM)	AP 210A, AD 280A KTXC(AM)	Delete Ch 249C3
McQueeney, TX	-----	249C1	Delete Ch249C3 @ Cuero & Change community of license to McQueeney on Ch 249C1
Beeville, TX	250C2	296AC	Delete Ch 250C2, Add CH296A & change antenna site
Mason City, TX (aloc)	249C2	273C2, 281C2, 289C2	See Engineering statement & Legal narrative
Mason, TX (apps)	249C2	273C2, 281C2, 289C2	See Engineering statement & Legal narrative
San Angelo, TX	211C2, 225C1, 230C1, 234C1, 248C1, 254C, 261C2, 270C1, 298C1, 289C3	211C2, 225C1, 230C1, 234C1, 248C1, 254C, 261C2, 270C1, 298C1, 291C2	Channel, class and site change.
Colorado City, TX (lic)	292A (291A)	296A	Channel change only.
Eldorado, TX	293A	285A	Channel change only.
Cotulla, TX	249A	242A	Channel change only
Brownwood, TX	207A, 212A, 219A, 257C2, 268C1 (267C1), 281C1	207A, 212A, 219A, 257C2, 268C1 (267C1), 245C1	Channel change only
San Saba, TX	246A	291A	Channel change only.

Table 1

Engineering Statement

In Support of a

Counterproposal MM Docket 99-357 Rawhide Radio, LLC

General

The instant counterproposal was prepared for Rawhide Radio, LLC ("Rawhide"), licensee of KVCQ, channel 249C3, Cuero, Texas. It is prepared and submitted in response to an NPRM for MM Docket 99-357 (see DA99-2810). Rawhide proposes to delete channel 249C3 at Cuero and subsequently allocate channel 249C1 at McQueeney, Texas. It proposes that the license of KVCQ be modified accordingly.

The instant counterproposal occurs due to the Rawhide effort to provide a third channel at Mason. The instant scenario seeks the allotment of channel 289C2 at Mason. The sub-moves (additional spectrum modifications) required for this allotment create a mutually exclusive (MX) with the NPRM in its proposed use of channel 293A at Eldorado, Texas. Therefore, if the Commission adopts the Rawhide counterproposal as submitted the proposed allotment of channel 293A at Eldorado, Texas, as a first local service must be denied. However, the Rawhide counterproposal offers channel 285A as a substitute allotment at Eldorado.

Methods

The Rawhide counterproposal is presented in sections, with each channel or licensed facility where a change is proposed is discussed individually. All sections begin with an allocation or channel spacing study. The proposed modification's technical compliance is then supported by additional exhibits.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR search program. The FCC F(50,50) contours were calculated using SoftWright's Terrain Analysis Package (TAP) Version 4.00.282. The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and gain/loss areas were conducted by a professional mapping program from MapInfo Corporation, Version 5.0. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries were critical, the boundaries were cross-checked with the U.S. Census Bureau's TIGER maps.

All modifications that require a class change or antenna site modification have a gain/loss study for population and square kilometers. The two facilities that require community of license changes include a remaining services study that demonstrates more than five (5) remaining services in the loss areas.

Nature of the Rawhide Counterproposal

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. Rawhide proposes to delete channel 249C3 at Cuero and substitute channel 249C1 at McQueeney, Texas for use by KVCQ. In order to accomplish this, various channels and licensed facilities are proposed to be modified in order to create compliance with §73.207. The counterproposal provides for first local services at McQueeney, Texas, and an increase in square kilometers covered. This is demonstrated by the large increase in the number of persons served by the new 60-dBu contour.

The allotment of channel 249C1 at McQueeney requires the following modifications:

I). KYTX - channel 250C2 , Beeville, Texas. Presently KYTX, Beeville, Texas, operates on channel 250C2. The instant Rawhide counterproposal requires the downgrade and site change of KYTX to channel 296A at a site closer to the community reference coordinates of Beeville.

II). AL249A - channel 249A, Cotulla, Texas. Previously channel 249A is an allocated but unused channel at Cotulla. The Rawhide counterproposal requires the deletion of channel 249A and the substitution of channel 242A with the channel 249A allotment coordinates used as reference.

III). AP249C2 – channel 249C2, Mason, Texas. Channel 249C2 has been allocated to Mason and a filing window opened. There are three pending applicants at Mason. In a previous NPRM, one of the Mason applicants proposed the allotment of three class C2 channels at Mason or, in essence, a class C2 channel for each applicant.

The Rawhide counterproposal requires the substitution of channel 289C2 for channel 249C2. However, channel 281C2 is also available as a substitute channel, although it appears to have short spacing to channel 281C1 at Pearsall, Texas. Rawhide is aware that one of the proposed additional channels for Mason is channel 288C2. Channel 288C2 is not an option for substitution at Mason, since the required fully spaced window places the channel in excess of 34 kilometers from the community's reference coordinates. A class C2 is allowed only 32.6 kilometers for a city-grade (70 dBu) contour. As demonstrated later, channel 288C2 at Mason does not meet the requirements of §73.315. In addition, channel 288C3 has been proposed for allocation at Santa Anna, Texas. This allocation at Santa Anna is MX with channel 288C2 at Mason by 74.68 kilometers. The Santa Anna proceeding is past the comment and reply

periods with no mention of channel 288C2. Therefore, it is apparent that the Commission did not give consideration to channel 288C2 as an allotted channel for Mason.

Channel 281C2 can be allocated to Mason with reference coordinates that meets the spacing requirements of all three applicants for channel 249C2 at Mason, after the proposed Rawhide substitution of channel 291A for channel 246A at San Saba, and channel 245C1 for channel 281C1 at Brownwood. If the reference sites of the Mason applicants are used, there is an approximate 24-kilometer short space to the proposed allotment of channel 281C1 at Pearsall, Texas. The legal section of the instant counterproposal discusses why the allotment of channel 281C1 at Pearsall is errant and should not have been accepted for filing. However, if the Commission chooses to accommodate channel 281C1 at Pearsall and channel 281C2 at Mason, the change in channel 281C1 at Pearsall can be changed to those offered by Charlotte Radio Broadcasting ("Charlotte") in the Pearsall NPRM. The allotment of channel 281C1 at Pearsall with the modified reference coordinates offered by Charlotte, combined with a change in the allotment coordinates of channel 281C2 at Mason, will accommodate both. If channel 281C2 is used as the substitute for one or more of the existing three applicants at Mason and channel 281C1 is modified at Pearsall, the current Mason applicants will be required to change their application reference sites. However, if the Pearsall PRM is dismissed, channel 281C2 can be substituted at each applicant's reference site with no other spectrum modifications, other than those proposed changes at San Saba and Brownwood.

The substitution of a third class C2 channel at Mason creates the MX scenario in the instant counterproposal. The proposed substitution of channel 289C2 is possible once the Rawhide spectrum changes are made. As stated previously, the proposed substitution of channel 288C2 at Mason was defective at filing, since it did not satisfy §73.315 of the Commission's Rules.

The proposed channel 289C2 allotment uses the application site of Jayson D. and Janice M. Fritz as reference. This site gives full spacing to all pertinent FM facilities; however, the applications of Foxcom, Inc. and BK Radio will require slight modifications to eliminate minor short spacings if channel 289C2 is used in lieu of channel 249C2 or channel 281C2 at Mason, the following changes must occur:

A) KMDX - channel 289C3, San Angelo, Texas. Presently KMDX operates on channel 289C3 licensed to San Angelo, Texas. The instant Rawhide counterproposal's use of channel 289C2 at Mason creates a short space of 6.71 kilometers to the licensed site of KMDX. Therefore, Rawhide proposes to have KMDX modified to operate on its present MX channel of 291C2. This proposal provides for an upgrade in the licensed facilities of KMDX to a class C2 from its licensed class C3. However, this is permissible, since the upgrade channel of 291C2 is MX with its licensed channel of 289C3. In order to provide the required spacing to all pertinent FM facilities and proposals, the reference coordinates of channel 291C2 at San Angelo must be modified from the present KMDX channel 289C3 licensed site. This modification creates a short space to the proposed allotment of channel 293A at Eldorado. **It is at this point the instant Rawhide counterproposal is MX with the NPRM that calls for the allocation of channel 293A at Eldorado, Texas.** However, in order for

channel 291C2 to be used by KMDX at San Angelo, the following spectrum change must be made. Rawhide proposes that channel 285A be substituted at Eldorado in lieu of channel 293A. This substitution can be accomplished without modifying the current Eldorado allocation coordinates or additional spectrum changes.

- 1.) KAUM - channel 291A, Colorado City, Texas. Presently KAUM operates on channel 292A licensed to Colorado City, Texas. In a previous MM Docket, KAUM was ordered from channel 292A to channel 291A. However, at this point, that MM Docket has not been effectuated. However, the instant counterproposal considers channel 292 and channel 291 at Colorado City. The substitution of channel 291C2 for channel 289C3 at San Angelo creates a short space to the allotted channel 291A at Colorado City of 42.07 kilometers. Therefore, in order for channel 291C2 to be used at San Angelo, Rawhide proposes the substitution of channel 296A at Colorado City for channel 292A or channel 291A at Colorado City for use by KAUM. The substitution uses the licensed site of KAUM as reference.
- B). AL291A - channel 291A, Kerrville, Texas. Presently channel 291A is an allocated but unused channel at Kerrville, Texas. The substitution of channel 289C2 for channel 249C2 (using the Fritz application site as reference) at Mason creates a short space of 1.66 kilometers. The Rawhide counterproposal requests a modification of the allotment coordinates for channel 291A at Kerrville to a site that gives the required spacing to channel 289C2 at Mason. The Kerrville channel 291A modification can be made without creating short spacing to any other FM facilities.

EXHIBITS EXPLAINED

KVCQ

Exhibit E, Figure 1 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 249C1 at McQueeney. The study depicts all of the major on-channel and adjacent channel modifications required, but not the subchanges. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study depicts the KVCQ channel 249C1 allotment coordinates, a maximum class C 70 dBu contour, and the community boundaries of McQueeney. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 3 is a portion of the US Census Bureau' TIGER map of the city boundaries of McQueeney. Exhibit E, Figure 4 is a map demonstrating the gain and loss area of the respective 60 dBu contours for KVCQ. Exhibit E, Figure 5 is a map depicting the remaining services in the loss area after KVCQ is deleted at Cuero and allocated to McQueeney. Exhibit E, Figure 6 is a list of the facilities included in Exhibit E, Figure 5. The numbers shown in Exhibit E, Figure 5 are the number of signals that serve the area where the number is located inside the loss area. (WOAI-AM's service contour is not shown, as that contour completely encompasses the entire loss area.)

KYTX

Exhibit E, Figure 7 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 296A for channel 250C2 at the Rawhide modification site for KYTX, Beeville, Texas. The study depicts that no major on-channel or adjacent channel modifications are required. Exhibit E, Figure 8 is hypothetical 70-dBu contour map showing that channel 296A at Beeville will remain in compliance with

§73.315 of the Commission's Rules. Exhibit E, Figure 9 is a gain/loss study showing the area and population gained and lost within the current and proposed 60-dBu contours.

AP249C2/AL249C2

As previously discussed, one of the applicants for channel 249C2 at Mason proposed the substitution of two additional channels. The instant Rawhide counterproposal proposes to accommodate that request. Exhibit E, Figure 10 is an allocation study showing that channel 273C2 can be allocated to Mason with a site restriction of 16.26 kilometers. Exhibit E, Figures 11, 12, and 13 are channel studies using the application sites of each applicant at Mason as reference on channel 281C2. The apparent short space to KBAE on channel 284C3 at Llano, Texas is of no concern, since channel 284C3 at Llano was deleted and substituted as channel 285C2 at Marble Falls, Texas in MM Docket 97-174. However, the short space to Pearsall is of concern, but should not be considered by the Commission, due to the arguments stated in the legal section of the instant counterproposal.

Exhibit E, Figure 14 is an allocation study considering the Charlotte modified reference coordinates for channel 281C1 at Pearsall and a modified Mason site. This study demonstrates that channel 281 can be allotted to both Mason and Pearsall, if the Commission desires. Furthermore, if the Mason community reference coordinates are used for the allotment of channel 281C2, channel 281C1 can be allotted to Pearsall at the petitioner's preferred site and not conflict with channel 281C2 at Mason. See Exhibit E, Figure 14.

Exhibit E, Figure 15 is an allocation study with spacing to all known FM facilities that are affected by the substitution of channel 289C2 for channel 249C2 at Mason, Texas,

using the Fritz application coordinates as reference. This substitution requires that the two remaining applicants (BK Radio and Foxcom), as well as the allocation coordinates for channel 249C2 at Mason, make minor changes to their pending applications that specify sites inside the channel 289C2 allotment window. If the allotment coordinates for channel 249C2 at Mason are used as reference, there are short spaces of 1.63 kilometers to KFMK, channel 290C2, Round Rock, Texas, and 2.85 kilometers to the allocation coordinates of channel 291A at Kerrville, Texas. The channel 291A allotment coordinates could be modified to clear channel 289C2 at Mason when the channel 249C2 allotment coordinates are used, but KFMK at Round Rock is a licensed facility that is not participating the instant Rawhide scenario. Therefore, the allocation coordinates for channel 289 at Mason must be modified slightly to eliminate the KFMK short space. Exhibit E, Figure 16 is a map showing the 70 dBu contour for channel 289C2 and the community boundaries of Mason. This map uses the proposed Rawhide modified allocation coordinates for channel 289C2. It verifies compliance with §73.315 of the Commission's Rules and Regulations. Exhibit E, Figure 17 is a gain/loss study comparing the hypothetical 60-dBu contour for AL249C2 to that of AL289C2.

KXYL

Exhibit E, Figure 18 is an allocations study depicting spacing to all known FM facilities of channel 245C1 for channel 281C1 at the licensed site of KXYL, Brownwood, Texas. Three different petitioners in MM Docket 98-198 proposed the same substitution. The apparent short spacing to channel 245C3 at Cross Plains is of no concern, since all expressions of interest in Cross Plains have been withdrawn.

KBAL

Exhibit E, Figure 19 is an allocations study depicting spacing to all known FM facilities of channel 289A for channel 246A at the licensed site of KBAL, San Saba, Texas. Three different petitioners in MM Docket 98-198 proposed the same substitution.

KMDX

Exhibit E, Figure 20 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 291C2 for channel 289C3 at San Angelo, Texas. This proposed substitution/upgrade requires a modification of the KMDX antenna site to give clearance to existing FM facilities. The study demonstrates short space to KAUM, Colorado City, Texas on channel 292A (or channel 291A). Exhibit E, Figure 21 is a copy of the hypothetical class C2 70-dBu contour and the community boundaries of San Angelo. Exhibit E, Figure 22 is a gain/loss study comparing the licensed and proposed 60-dBu contours.

As stated previously, the upgrade of KMDX in the instant Rawhide counterproposal is permissible, since the licensed channel of 289C3 is MX with the proposed allocation of channel 291C2 at San Angelo.

AD293A

AD293A is proposed by Schleicher County Radio in MM Docket 99-357 to be allocated at Eldorado, Texas. However, when channel 291C2 is substituted for channel 289C3 at San Angelo, a mutual exclusivity (MX) is created. Rawhide, in an attempt to maintain the allocation at Eldorado, proposes channel 285A in lieu of channel 293A at the channel 293A reference coordinates. Exhibit E, Figure 23 is an allocation study showing that

channel 285A can be substituted for channel 293A at Eldorado with no additional spectrum changes.

KAUM

Exhibit E, Figure 24 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 296A for channel 291A or channel 292A at Colorado City, Texas. Presently KAUM operates on channel 292A, but it has been ordered to change channels to 291A in a previous MM Docket. The substitution of channel 296A has no negative influence on the previous MM Docket that deleted channel 292A and substituted channel 291A at Colorado City. This substitution is proposed at the licensed site of KAUM.

AL291A

Exhibit E, Figure 25 is an allocation study depicting the spacing to all known FM facilities that are affected by the modification of the reference coordinates for channel 291A at Kerrville, Texas. The study shows that no additional spectrum changes are needed for the proposed modification of channel 291A at Kerrville. It also demonstrates that when the Rawhide proposed modification is used at Kerrville, clear spacing is afforded to the new allotment reference for channel 289C2 at Mason and also the Fritz application coordinates. Exhibit E, Figure 26 is a map showing that the reference coordinates Rawhide proposes in the instant counterproposal for AL291 at Kerrville will continue to comply with §73.315 of the Commission's Rules.

AL249A

Exhibit E, Figure 27 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 242A for channel 249A at

Cotulla, Texas. The study demonstrates no additional spectrum changes are required and this substitution can be accomplished the AL249A reference coordinates. Hence, no maps are included.

Rawhide Counterproposal Gain-Loss Area

Exhibit E, Figure 28 is a tabulation of the gain/loss area for each facility which requires an antenna location or class change. Stations that are proposed to have only their present channel substituted at their licensed site and require no class change are not included in this study. It is assumed that the service they would provide with a channel change would not deviate from their current coverage.

The study includes five facilities that have a deviation in their coverage area proposed by the instant counterproposal. Listed in the study is each station's loss and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's estimated 1999 population figures. It depicts a cumulative total loss area of 7,298 square kilometers and a gain area of 17,237 square kilometers. The Rawhide counterproposal has a net area gain of 9,939 square kilometers.

The population loss has a cumulative loss of 110,917 persons, while the population gain is 421,842 persons. Therefore, the net population gain of the Rawhide counterproposal is 310,925 persons.

Proposed Elimination of Short-Space

The Rawhide counterproposal, if adopted, will eliminate the following existing short-spaces between various stations:

- | | |
|--|----------|
| 1) KVCQ.L, Cuero, TX to KYTX, Beeville, TX | 10.88 km |
| 2) KAUM (CH292A), Colorado City, TX to KKHR, Abilene, TX | 2.99 km |

This short-spacing will be eliminated by the adoption of the Rawhide counterproposal.

Conclusion

The Rawhide counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces a new first local at McQueeney, Texas, a community of 2,063 persons (according to 1990 Census Bureau data) via the upgrade of KVCQ. It also provides for the upgrade of KMDX at San Angelo from a class C3 to a class C2. Furthermore, it does not deprive Eldorado of the service proposed by Schleicher County Radio.

ENGINEERING STATEMENT

In Support of a Counterproposal MM Docket 99-357 Rawhide Radio, LLC

Allocation Study - (KVCQ) Ch 249C1 McQueeney, Texas
[Depicting spacing & modifications required for proposed upgrade]
(using requested allotment coordinates as reference)

29 21 24 N.	Class C1	Search Date					
97 39 48 W.	Current rules spacings	02-04-00					
-----	Channel 249 - 97.7 MHz	-----					
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----	-----	-----	-----	-----	-----	-----	-----
Community of McQueeney	TX	306.0	44.32				
Reference Coordinates:							
North Latitude: 29-35-30							
West Longitude: 98-01-59							
AD249 249C2 Luring	TX	5.2	19.63	224.0	-204.37	*	
Of No Concern:							
Previously filed petition by							
Instant petitioner - Rawhide, licensee							
Of KVCQ							
KVCQ 249C3 Cuero	TX	127.2	51.84	211.0	-159.16	*	
Of No Concern:							
Licensed facility of KVCQ							
KYTX 250C2 Beeville	TX	196.0	113.08	158.0	-44.92	*	
Of Concern:							
Substitution of Ch 296A proposed @							
NL: 28-27-03, WL: 97-50-15							
ALOPEN 249C2 Mason	TX	312.5	190.32	224.0	-33.68	*	
DE249 249C2 Mason	TX	312.5	190.32	224.0	-33.68	*	
AP249 249C2 Mason	TX	312.5	192.16	224.0	-31.84	*	
AP249 249C2 Mason	TX	313.8	193.81	224.0	-30.19	*	
AP249 249C2 Mason	TX	313.8	193.81	224.0	-30.19	*	
Of Concern:							
Substitution of Ch 289C2 &							
Application modification proposed for							
BK Radio & Foxcom. Ch 249C2 allotment							
Reference change also proposed to							
NL: 30-34-54, WL: 99-07-39							
ALOPEN 249A Cotulla	TX	238.0	178.08	200.0	-21.92	*	
Of Concern:							
Substitution of Ch 242A proposed							
@ Ch 249A allotment site							
KAJA.C 247C San Antonio	TX	288.1	98.68	105.0	-6.32	*	
Of No Concern:							
Auxiliary facility							

Continued on next page

Exhibit E, Figure 1

Allocation Study - (KVCQ) Ch 249C1 McQueeney, Texas
 [Depicting spacing & modifications required for proposed upgrade]
 (using requested allotment coordinates as reference)

29 21 24 N.				Class C1				Search Date
97 39 48 W.				Current rules spacings				02-04-00
----- Channel 249A - 97.7 MHz -----								
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
-----	-----	-----		-----	-----	-----	-----	-----
KAJA	247C	San Antonio		TX	280.2	104.52	105.0	-0.48
KBXX	250C	Houston		TX	83.4	210.28	209.0	1.28
KBXX	250C	Houston		TX	83.4	210.28	209.0	1.28
KFTX	248C1	Kingsville		TX	178.1	179.14	177.0	2.14
KWTXFM	248C	Waco		TX	8.7	220.40	209.0	11.40
KWTXFM	248C	Waco		TX	8.8	222.23	209.0	13.23

ENGINEERING STATEMENT

In Support of a Counterproposal MM Docket 99-357 Rawhide Radio, LLC

US Census Bureau's TIGER Map of McQueeney, Texas

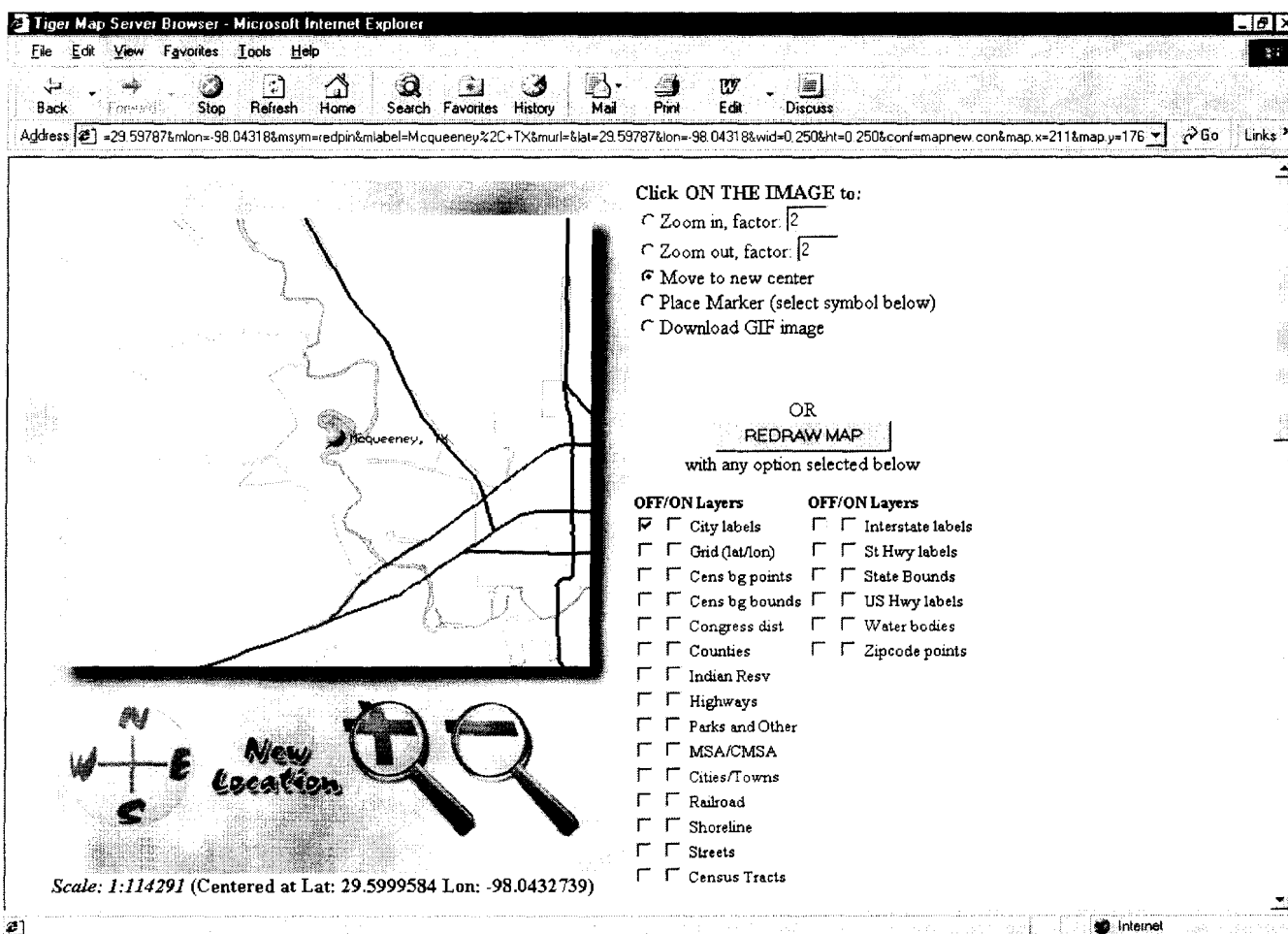
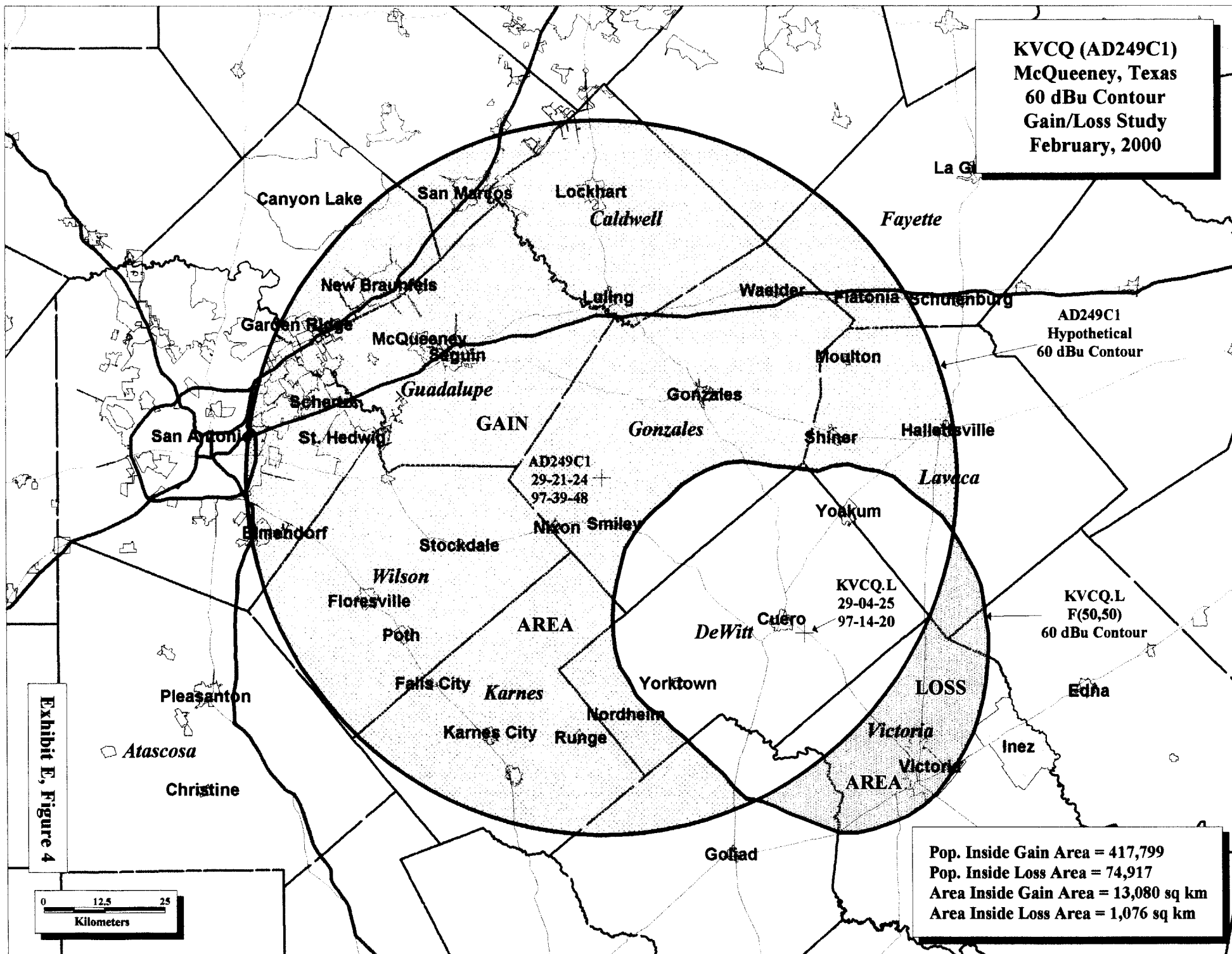


Exhibit E, Figure 3

**KVCQ (AD249C1)
McQueeney, Texas
60 dBu Contour
Gain/Loss Study
February, 2000**



**KVCQ (AD249C1)
McQueeney, Texas
Remaining Services
Study
February, 2000**

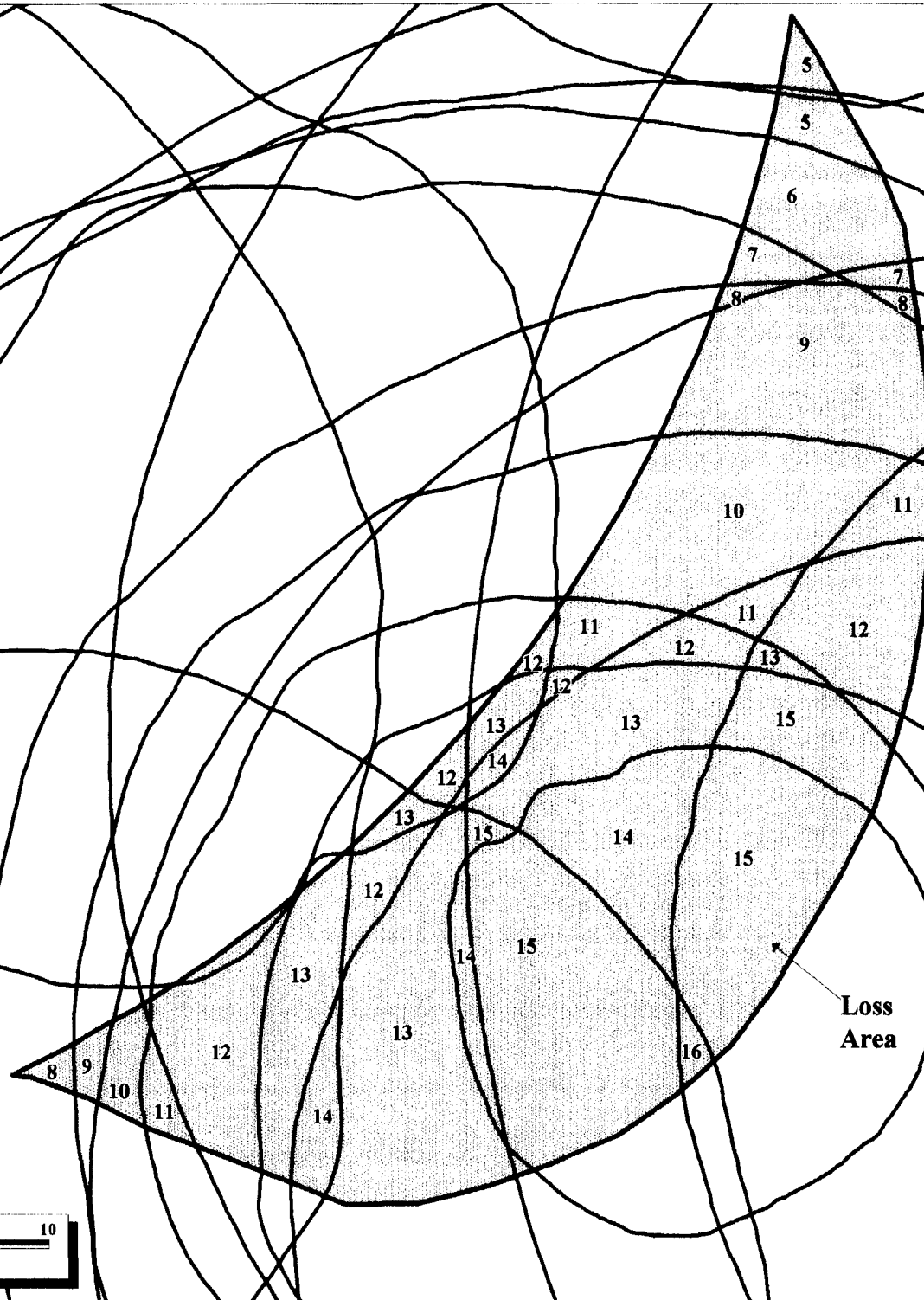


Exhibit E, Figure 5

0 5 10
Kilometers

**Note: WOAI's 0.5 mV/m
service contour is not shown.
This contour encompasses
the entire loss area.**

ENGINEERING STATEMENT

In Support of a Counterproposal MM Docket 99-357 Rawhide Radio, LLC

List of Stations in Remaining Services Study

<u>PREFIX</u>	<u>ARN</u>	<u>CALL</u>	<u>CLASS</u>	<u>STATUS</u>	<u>CITY</u>	<u>STATE</u>	<u>CHANNEL</u>
BLED	871103KA	KFTG	A	LIC	Pasadena	TX	201
BPED	960610MK	NEW	A	APP	Victoria	TX	203
BLED	941017KA	KXBJ	C3	LIC	Victoria	TX	207
BPED	980513MC	NEW	A	APP	Cuero	TX	210
BLED	950410KH	KVRT	C2	LIC	Victoria	TX	214
BPED	971114MA	NEW	C3	APP	Bloomington	TX	218
BLH	910117KB	KVLT	A	LIC	Victoria	TX	222
BLH	920518KB	KPLV	C1	LIC	Port Lavaca	TX	227
BMPH	970108IA	KAJI	C3	APP	Point Comfort	TX	231
BLH	870107KA	KVIC	C1	LIC	Victoria	TX	236
BPH	960429IF	KHMC	C3	CP	Goliad	TX	240
BPH	950331MH	KGUL	C3	CP	Edna	TX	241
BLH	910221KA	KIOXFM	C1	LIC	El Campo	TX	245
BLH	850402KR	KTXNFM	C1	LIC	Victoria	TX	254
BPH	971124ID	KTXM	A	CP	Hallettsville	TX	260
BLH	890224KF	KEPG	A	LIC	Victoria	TX	265
BPH	960111AS	NEW	C2	APP	Karnes City	TX	276
BMPH	961016IA	KZAM	C2	CP	Ganado	TX	284
BLH	940617KF	KLUB	C3	LIC	Bloomington	TX	295
BLH	860722KB	KIXS	C1	LIC	Victoria	TX	300
BL	980430KB	WOAI-AM	A (AM)	LIC	San Antonio	TX	1200 kHz

ENGINEERING STATEMENT

In Support of a Counterproposal MM Docket 99-357 Rawhide Radio, LLC

Allocation Study - (KYTX) Ch 296A Beeville, Texas
[Depicting spacing required for proposed substitution]
(using requested allotment coordinates as reference)

28 27 03 N.				Class A			Search Date
97 50 15 W.				Current rules spacings			02-04-00
----- Channel 296A -107.1 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
Community of Beeville				TX	122.5	10.42	
Reference coordinates:							
North Latitude: 28-24-01							
West Longitude: 97-44-52							
KCCG	297C3	Ingleside	TX	136.8	88.76	89.0	-0.24 *
>KFLZ	295C3	Bishop	TX	185.0	88.78	89.0	-0.22 *
>KCCG.C	297C3	Ingleside	TX	136.8	88.78	89.0	-0.22 *
KXTNFM	298C	San Antonio	TX	335.5	100.36	95.0	5.36 *
KCJZ	294C	Terrell Hills	TX	320.9	104.69	95.0	9.69 *
KLUB	295C3	Bloomington	TX	74.0	101.97	89.0	12.97
KGSR	296C2	Bastrop	TX	7.7	186.88	166.0	20.88
>XHGTSF	297B	Nuevo Laredo	TA	237.0	195.99	170.0	25.99
>AL297	297B	Nuevo Laredo	TA	238.5	198.77	170.0	28.77
>ALOPEN	293C3	Refugio	TX	121.5	73.32	42.0	31.32
>KTKY.A	293C3	Refugio	TX	121.5	73.32	42.0	31.32
>AD293	293C2	Taft	TX	136.8	88.78	55.0	33.78
AL296	296B	Matamoros	TA	173.7	286.69	240.0	46.69
XHVTHF	296B	Matamoros	TA	173.3	287.31	240.0	47.31

**KYTX (AD296A)
Beeville, Texas
Hypothetical
70 dBu Contour
February, 2000**

AD296A
(KYTX)
Hypothetical
70 dBu Contour

Bee

+ KYTX
(AD296A)
28-27-03
97-50-15

Beeville
City
Limits

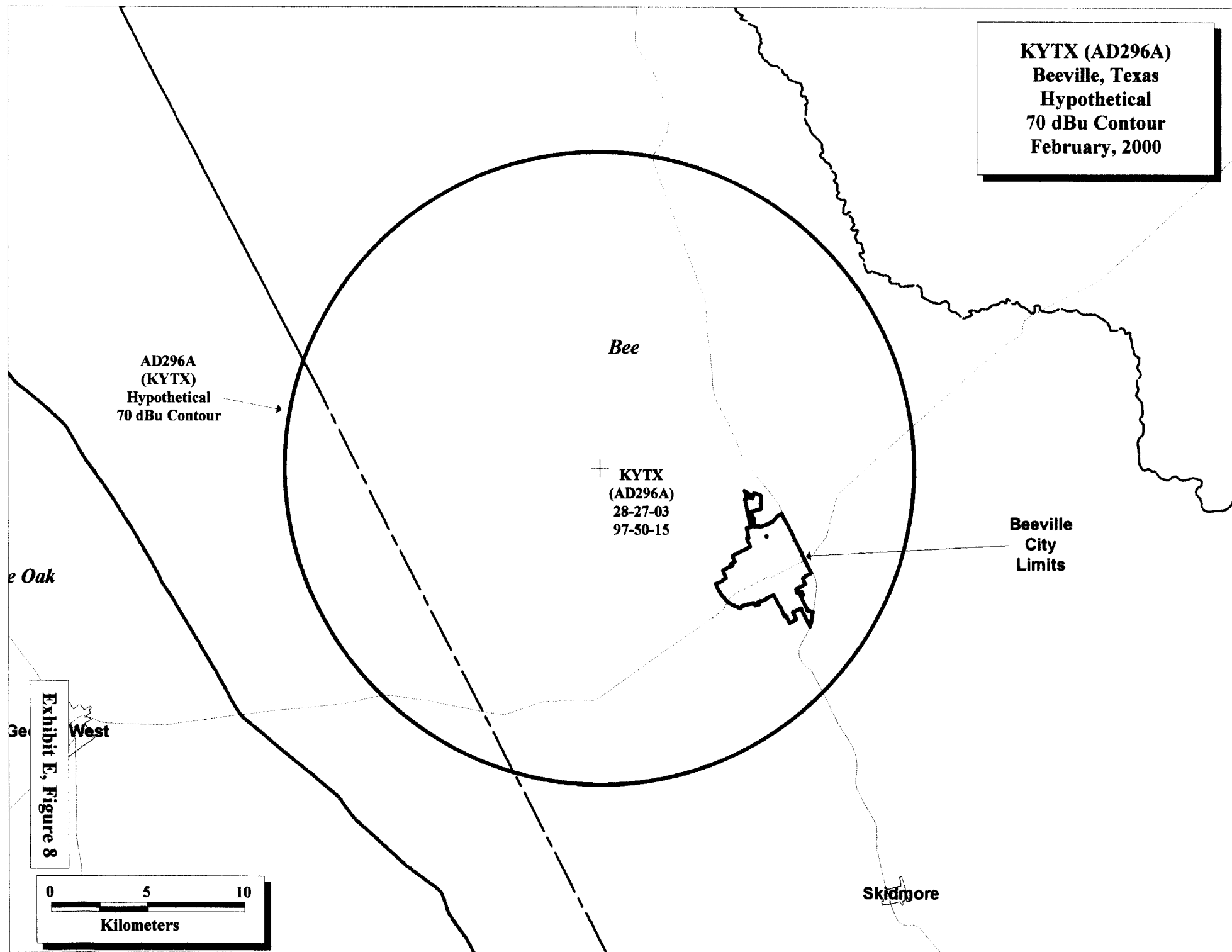
e Oak

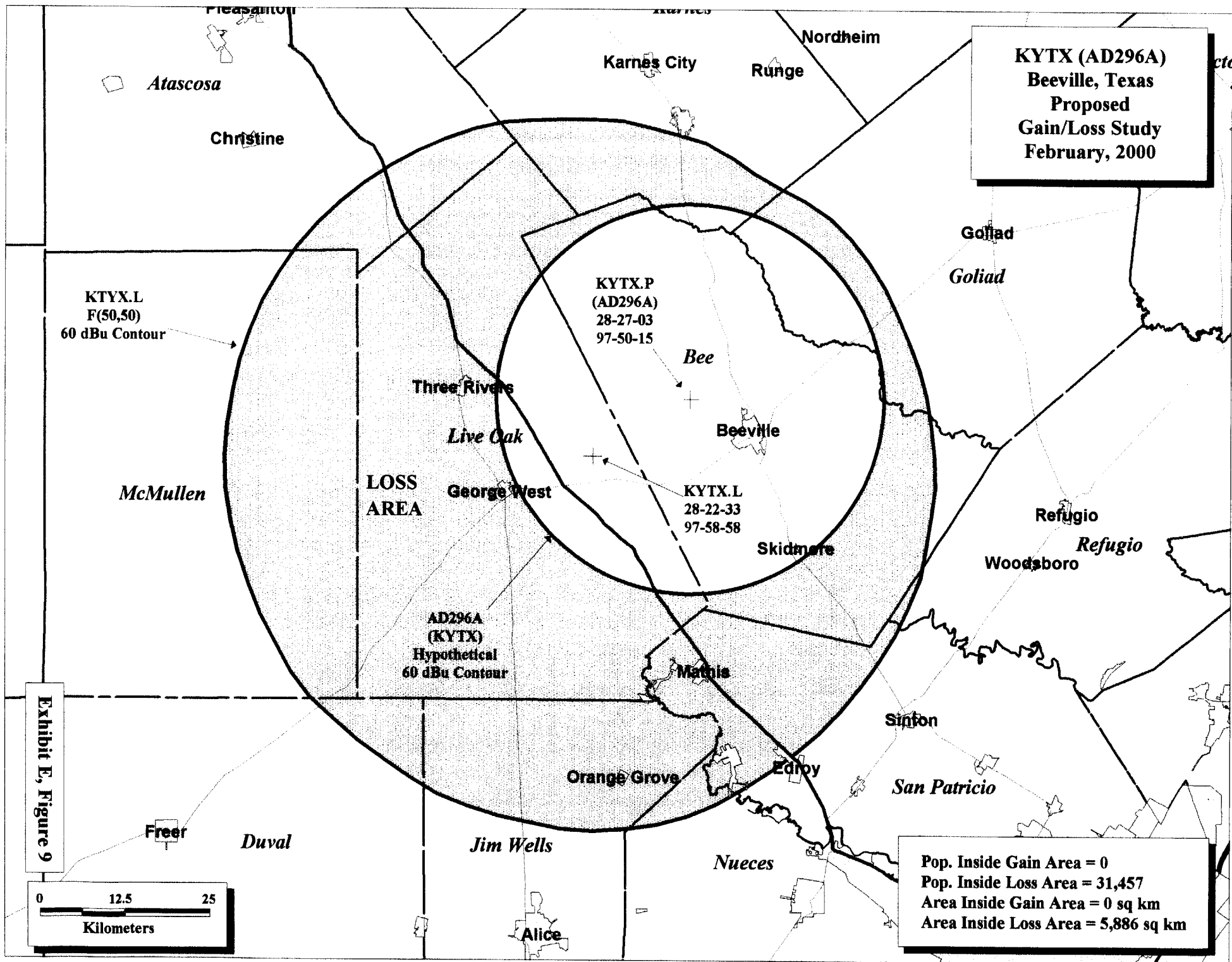
Ge West

Exhibit E, Figure 8

0 5 10
Kilometers

Skidmore





ENGINEERING STATEMENT

In Support of a Counterproposal MM Docket 99-357 Rawhide Radio, LLC

Allocation Study - (AL 249C2) Ch 273C2 Mason, Texas
[Depicting spacing required for proposed substitution]
(Using requested allotment coordinates as reference)

30 38 21 N.			Class C2			Search Date	
99 20 36 W.			Current rules spacings			02-07-00	
-----			Channel 273	-102.5	MHz	-----	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin

Community of Mason			TX	41.8	16.26		
Reference Coordinates:							
North Latitude: 30-44-55							
West Longitude: 99-13-49							
AD273	273C2	Mason	TX	0.0	0.00	190.0	-190.00 *
Of No Concern:							
Allotment reference to allotment							
Proposed in previous NPRM							
ALOPEN	275A	Llano	TX	82.1	55.12	55.0	0.12 *
AD275	275A	Llano	TX	82.2	55.16	55.0	0.16 *
KTFM	274C1	San Antonio	TX	148.5	158.57	158.0	0.57 *
AD271	271A	Llano	TX	80.7	55.65	55.0	0.65 *
AD272	272C1	Crossplains	TX	5.1	165.76	158.0	7.76 *
AD272	272C3	Coleman	TX	356.6	134.97	117.0	17.97
KBRQ	273C1	Hillsboro	TX	57.7	246.13	224.0	22.13
KPEZ	272C2	Austin	TX	107.6	152.75	130.0	22.75
AD276	276A	Bandera	TX	164.3	90.16	55.0	35.16
AD276	276A	Bandera	TX	164.3	90.16	55.0	35.16
ALOPEN	219A	Brady	TX	0.9	54.98	15.0	39.98